



GVNW CONSULTING, INC.

November 19, 2014

Received & Inspected

1001 WATER STREET, STE. A-100
KERRVILLE, TX 78028
TEL 830.896.5200
FAX 830.896.5202

NOV 20 2014

REDACTED – FOR PUBLIC INSPECTION

FCC Mail Room ~~via~~ FedEx and ECFS

Marlene H. Dortch, Secretary
Federal Communication Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Confidential Financial Information Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, and requesting Confidential treatment for financial information pursuant to sections 0.457 and 0.459 of the Commission's rules. Before the Federal Communications Commission. Revised Form 481 – Carrier Annual Reporting Data Collection, 2014
WC 14-58, 11-42

Dear Ms. Dortch:

DOCKET FILE COPY ORIGINAL

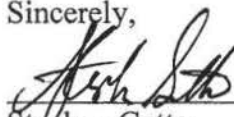
On behalf of Dell Telephone Cooperative, Inc. (TX) ("Dell"), GVNW Consulting, Inc. hereby submits the attached redacted and confidential versions of its Revised "FCC Form 481 – Carrier Annual Reporting Data Collection" information pursuant to sections 54.313 and 54.422 of the Commission's rules, as filed with the Universal Service Administrative Company. A copy is also being submitted to the Texas Public Utility Commission.

Dell requests confidential treatment under the Protective Order adopted in this proceeding for the section 54.313(f)(2) financial information included in this report on the grounds that it is competitively sensitive information that is secure from public access and this information should not be released publicly for inspection as it could be used to disadvantage or harm Dell. In addition, Dell is requesting confidential treatment pursuant to sections 0.457 and 0.459 of the Commission's rules for the Five-Year Build-Out Plan that is required by section 54.313(a)(1) to be attached to this report.

In accordance with the Protective Order, two redacted copies marked "REDACTED – FOR PUBLIC INSPECTION" and one non redacted confidential version marked "CONFIDENTIAL – NOT FOR PUBLIC INSPECTION" are being filed with the Commission. A redacted copy has also been filed via the Electronic Comment Filing System.

If you have any questions, please contact me at sgatto@gvnw.com or 830-895-7226.

Sincerely,


Stephen Gatto
Senior Consultant

No. of Copies rec'd 0+1
List ABCDE

Cc: Mr. Charles Tyler, FCC Telecommunications Access Policy Division (two copies, confidential)

FCC Form 481 - Carrier Annual Reporting
Data Collection Form

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

Received & Inspected

NOV 20 2014

FCC Mail Room

<010> Study Area Code 442066

<015> Study Area Name DELL TEL. CO-OP - TX

<020> Program Year 2015

<030> Contact Name: Person USAC should contact with questions about this data Denny Bergstrom

<035> Contact Telephone Number: 9159642352 ext. Number of the person identified in data line <030>

<039> Contact Email Address: dbergstrom@delldtelco.com Email of the person identified in data line <030>

ANNUAL REPORTING FOR ALL CARRIERS		54,313 Completion Required	54,422 Completion Required
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<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice) 0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband) 0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed 0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile 0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed 0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile 0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 442066tx510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 442066tx610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> 442066tx1010.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442066
<015>	Study Area Name	DELL TEL. CO-OP - TX
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035>	Contact Telephone Number - Number of person identified in data line <030>	9159642352 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

- <112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

442066tx112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442066
<015>	Study Area Name	DELL TEL. CO-OP - TX
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Denny Bergetrom
<035>	Contact Telephone Number - Number of person identified in data line <030>	9159642352 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delitelco.com

[illegible]

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442066
<015>	Study Area Name	DELL TEL. CO-OP - TX
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035>	Contact Telephone Number - Number of person identified in data line <030>	9159642352 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

<701> Residential Local Service Charge Effective Date

1/1/2014

<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

(710) Broadband Price Offerings Data Collection Form FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442066
<015>	Study Area Name	DELL TEL. CO-OP - TX
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035>	Contact Telephone Number - Number of person identified in data line <030>	9159642352 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

[illegible]

(800) Operating Companies

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442066
<015>	Study Area Name	DELL TEL. CO-OP - TX
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	<u>Denny Bergstrom</u>
<035>	Contact Telephone Number - Number of person identified in data line <030>	9159642352 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com
<810>	Reporting Carrier	Dell Telephone Cooperative, Inc.
<811>	Holding Company	Dell Telephone Cooperative, Inc.
<812>	Operating Company	Dell Telephone Cooperative, Inc.

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442066
<015>	Study Area Name	DELL TEL. CO-OP - TX
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035>	Contact Telephone Number - Number of person identified in data line <030>	9159642352 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

<910> Tribal Land(s) on which ETC Serves

--

<920> Tribal Government Engagement Obligation

--

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442066
<015>	Study Area Name	DELL TEL. CO-OP - TX
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035>	Contact Telephone Number - Number of person identified in data line <030>	9159642352 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

<1120> Please check this box to confirm no terrestrial backhaul
options exist within the supported area pursuant to § 54.313(G)

☐

<1130> Please check this box to confirm the reporting carrier offers
broadband service of at least 1 Mbps downstream and 256 kbps
upstream within the supported area pursuant to § 54.313(G)

☐

(1200) Terms and Condition for Lifeline Customers**Lifeline****Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442066
<015>	Study Area Name	DELL TEL. CO-OP - TX
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035>	Contact Telephone Number - Number of person identified in data line <030>	9159642352 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

442066tx1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442066
<015>	Study Area Name	DELL TEL. CO-OP - TX
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035>	Contact Telephone Number - Number of person identified in data line <030>	9159642352 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010> 2nd Year Certification {47 CFR § 54.313(b)(1)} ☐

<2011> 3rd Year Certification {47 CFR § 54.313(b)(2)} ☐

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

<2012> 2013 Frozen Support Certification ☐

<2013> 2014 Frozen Support Certification ☐

<2014> 2015 Frozen Support Certification ☐

<2015> 2016 and future Frozen Support Certification ☐

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification Support Used to Build Broadband ☐

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017> 3rd year Broadband Service Certification ☐

<2018> 5th year Broadband Service Certification ☐

<2019> Interim Progress Certification ☐

<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	442066
<015> Study Area Name	DELL TEL. CO-OP - TX
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035> Contact Telephone Number - Number of person identified in data line <030>	9159642352 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) Progress Report on 5 Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

- (3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))
(3014) If yes, does your company file the RUS annual report

(Yes/No) ☒ ☒
(Yes/No) ☒ ☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☒
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☒

- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, Is your company audited?

(Yes/No) ☒ ☒

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☐

- (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

- (3021) Management letter issued by the independent certified public accountant that performed the company's financial audit. ☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐

- (3023) Underlying information subjected to a review by an independent certified public accountant ☐

- (3024) Underlying information subjected to an officer certification. ☐

- (3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

**Certification - Reporting Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No: 3060-0986/OMB Control No: 3060-0819
 July 2013

<010>	Study Area Code	442066
<015>	Study Area Name	DELL TEL. CO-OP - TX
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035>	Contact Telephone Number - Number of person identified in data line <030>	9159642352 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer: ext.	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	442066
<015> Study Area Name	DELL TEL. CO-OP - TX
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Denny Bergstrom
<035> Contact Telephone Number - Number of person identified in data line <030>	9159642352 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Stephen Gatto</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: <u>Stephen Gatto</u>	
Name of Reporting Carrier: <u>DELL TEL. CO-OP - TX</u>	
Signature of Authorized Officer: <u>CERTIFIED ONLINE</u>	Date: <u>11/12/2014</u>
Printed name of Authorized Officer: <u>Denny Bergstrom</u>	
Title or position of Authorized Officer: <u>GM EVP</u>	
Telephone number of Authorized Officer: <u>9159642352 ext.</u>	
Study Area Code of Reporting Carrier: <u>442066</u>	Filing Due Date for this form: <u>07/01/2014</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: <u>DELL TEL. CO-OP - TX</u>	
Name of Authorized Agent or Employee of Agent: <u>Stephen Gatto</u>	
Signature of Authorized Agent or Employee of Agent: <u>CERTIFIED ONLINE</u>	Date: <u>11/12/2014</u>
Printed name of Authorized Agent or Employee of Agent: <u>Stephen Gatto</u>	
Title or position of Authorized Agent or Employee of Agent: <u>Consultant</u>	
Telephone number of Authorized Agent or Employee of Agent: <u>8308957226 ext.</u>	
Study Area Code of Reporting Carrier: <u>442066</u>	Filing Due Date for this form: <u>07/01/2014</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

(700) Price Offerings including Voice Rate Data Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442066
<015>	Study Area Name	DELL TEL. CO-OP - TX
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

1/1/2014

<703>

[illegible]

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442066
<015>	Study Area Name	DELL TEL. CO-OP - TX
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<711>

[illegible]

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442066
<015>	Study Area Name	DELL TEL. CO-OP - TX
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dbergstrom@delltelco.com

<810>	Reporting Carrier	Dell Telephone Cooperative, Inc.
<811>	Holding Company	Dell Telephone Cooperative, Inc.
<812>	Operating Company	Dell Telephone Cooperative, Inc.

[illegible]

DELL TELEPHONE COOPERATIVE, INC., TX – SAC 442066

FCC Form - Program Year 2015

Line 510

COMPLIANCE WITH SERVICE QUALITY STANDARDS
AND CONSUMER PROTECTION RULES - §54.313(a)(5)

Dell Telephone Cooperative, Inc. ("Dell" or "the Cooperative") complies with all applicable service quality standards and consumer protection rules as required by the Public Utility Commission of Texas ("PUC") and the Federal Communications Commission ("FCC").

The rates, terms and conditions under which the Cooperative operates are identified in its Local Service Tariff, which is approved by the PUC. The Cooperative's tariff contains provisions regarding its customer service and protection practices, including resolving customer disputes, applying for, refusing, disconnection and cancellation of service. Rates and terms of service are disclosed to customers upon application for service as part of a packet of information for new customers.

Service quality standards are established by the PUC and Dell consistently meets or exceeds those requirements. The Cooperative provides an annual report to the PUC pursuant to the commission's rules.

The protection of its customers' privacy and information is a constant part of Dell's quality of service. The Cooperative has a policy and operating procedures that comply with the FCC's Customer Proprietary Network Information ("CPNI") rules (47 C.F.R. 64.2001 – 64.2011). Certification of Dell's compliance with the FCC's CPNI rules is filed with the FCC annually.

DELL TELEPHONE COOPERATIVE, INC. - SAC 442066

FCC Form 481 - Program Year 2015

Line 610

ABILITY TO FUNCTION IN EMERGENCY SITUATIONS - §54.313(a)(6)

Dell Telephone Cooperative, Inc. ("Dell" or "the Cooperative") is capable of functioning in emergency situations. Dell has a reasonable amount of back-up power to ensure functionality without a commercial external power source. The Cooperative has permanently installed standby power generators at its exchange switching offices and remote switching locations have a minimum of eight (8) hours of backup battery capacity. These remote sites are also equipped to accept portable emergency power if necessary. The Cooperative's network is capable of managing traffic spikes resulting from emergency conditions.

DELL TELEPHONE COOPERATIVE, INC. - SAC 442066

FCC Form 481 - Program Year 2015

Line 1010

DESCRIPTION OF VOICE SERVICES RATE COMPARABILITY - §54.313(a)(10)

Dell Telephone Cooperative, Inc.'s ("Dell" or "the Company") Voice Services Pricing is no more than two standard deviations above the applicable urban rate floor for voice services. On March 20, 2014, the Wireline Competition Bureau ("Bureau") established a new average urban floor rate of \$20.46 and a maximum of \$46.96 as the Rate Comparability Benchmark. As shown by Dell's response to 700 (Attachment File: 442066tx700.pdf), Dell's total residential voice service rate plus mandatory state fees is \$19.34. When all state and federal mandatory charges are added to Dell's residential voice service rate the total rate is below the \$46.96 Rate Comparability Benchmark set by the Bureau.

LOCAL EXCHANGE SERVICE

4. Local Exchange Service (Cont'd)4.5 Lifeline Service Program.

(T)(D)

Scope and Purpose. Through this section the commission seeks to extend Lifeline Service to all qualifying customers, establish a procedure for Lifeline Automatic Enrollment and Lifeline Self-Enrollment, and define the responsibilities of participating telecommunications carriers, qualified customers, the Texas Health and Human Services Commission (THHSC), and the Low-Income Discount Administrator (LIDA) Program. This section applies to designated eligible telecommunications carriers as defined by §26.418 of this title (relating to Designation of Common Carriers as Eligible Telecommunications Carriers to Receive Federal Universal Service Funds) and designated eligible telecommunications providers as defined by §26.417 of this title (relating to Designation as Eligible Telecommunications Providers to Receive Texas Universal Service Funds (TUSF)), collectively referred to in this section as participating telecommunications carriers.

Lifeline Service. Each participating telecommunications carrier shall provide Lifeline Service as provided by this section. A customer with an income at or below 150% of the federal poverty guidelines be an eligible resident of Tribal lands, or participate in, or have a person or child who resides in the customer household who participates in a program identified in Chapter 47 of the Code of Federal Regulations § 54.409 and in P.U.C. Substantive Rule 26.412 regarding consumer qualification for Lifeline services.

.5.1 Lifeline Service Program.

Lifeline Service is a retail local service offering available to qualifying low-income customers sponsored by the FCC and available to qualifying low-income consumers.

(T)(D)

LOCAL EXCHANGE SERVICE

4. Local Exchange Service (Cont'd)

4.5 Lifeline Service Program (Cont'd)

(T)(D)

4.5.1 Lifeline Service Program (Cont'd)

4.5.1.1 Provision of Lifeline Service. Lifeline Service shall be provided according to the following requirements and the terms of the Low-Income Discount Procedural Guide (the Guide). The Guide compiles the regulatory and statutory requirements for, and roles of, participants in the rate reduction program, including participating telecommunications carriers, THHSC, the LDA, and customers, and sets out administrative information, including the required data formats and deadlines for transmitting information to the LDA, other program participants, and the commission. The initial version of the Guide will be approved by the commission, but it may be updated to reflect statutory or commission-approved changes in rules and program requirements, or to modify the format or timing of the provision of information by participating telecommunications carriers and the LDA, with the approval of the Executive Director.

- Designated Lifeline Services. The participating telecommunications carriers shall offer the services or functionalities enumerated in Title 47, Code of Federal Regulations, §54.10(a)(1-9) (relating to Supported Services for Rural, Insular and High Cost Areas).
- Toll Blocking. The participating telecommunications carriers shall offer toll blocking to all qualifying low-income customers at the time such customers subscribe to Lifeline Service. If the customer elects to receive toll blocking, that service shall become part of the customer's Lifeline Service and the customer's monthly bill will not be increased by otherwise applicable toll blocking charges.

LOCAL EXCHANGE SERVICE

4. Local Exchange Service (Cont'd)

4.5 Lifeline Service Program, (Cont'd)

(T)(D)

4.5.1 Lifeline Service Program, (Cont'd)

4.5.1.1 Provision of Lifeline Service, (Cont'd)

- Disconnection of Service.

Disconnection prohibition. Participating telecommunications carriers may not disconnect Lifeline Service for non-payment of toll charges.

Discontinuance of Lifeline Discounts for customers automatically enrolled. The Cooperative will discontinue Lifeline Service discounts upon notice by the LIDA that a customer is no longer eligible.

Discontinuance of Lifeline Discounts for customers who have self-enrolled. The Cooperative will discontinue Lifeline Service discounts upon notice by the LIDA that a customer is no longer eligible. The Cooperative will discontinue Lifeline Service discounts upon notice by the LIDA that a customer is no longer eligible.

- Service Deposit Prohibition. If the qualifying low-income customer voluntarily elects toll blocking from the participating telecommunications carrier, the carrier may not collect a service deposit pursuant to §26.24 of this title (relating to Credit Requirements and Deposits) in order to initiate Lifeline Service.

LOCAL EXCHANGE SERVICE

4. Local Exchange Service (Cont'd)

4.5 Lifeline Service Program (Cont'd)

(T)(D)

4.5.2 Lifeline Support.

4.5.2.1 Lifeline support amounts. Lifeline support amounts per qualifying low-income customer shall be provided to participating telecommunications carriers pursuant to Title 47, Code of Federal Regulations, §54.403 (relating to Lifeline Support Amount) and according to any applicable provisions of the Guide. Tribal Land discounts will be provided pursuant to Title 47, code of Federal Regulations, §54.403.

- Lifeline Service Discounts. The Cooperative shall grant qualifying low-income consumers support of \$9.25 per month or equal to the support amount as directed by the Federal Communications Commission in Chapter 47 of the Code of Federal Regulations regarding Lifeline Support.

Additional state reduction. A participating telecommunications carrier shall give a qualifying low-income customer the following:

an additional state-approved reduction of up to a maximum of \$3.50 in the monthly amount of intrastate charges.

(T)(D)